

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 5:17-CR-00560-14
	§	
MOHSEN MOHAMMADI-MOHAMMADI	§	

FACTUAL STATEMENT IN SUPPORT OF PLEA AGREEMENT

The United States of America, by and through Jennifer B. Lowery, Acting United States Attorney for the Southern District of Texas and José Angel Moreno, Assistant United States Attorney, and the defendant, **MOHSEN MOHAMMADI-MOHAMMADI** and the defendant's counsel, hereby stipulate as follows:

I.

If this case proceeded to trial, the United States of America would prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the Defendant's guilt:

II.

Beginning no later than on or about March 21, 2012, and continuing through in or about October 2013, **MOHSEN MOHAMMADI-MOHAMMADI (MOHAMMADI)** knowingly conspired and agreed with at least one other person to conduct financial transactions that affected interstate commerce. **MOHAMMADI** knew that at least some of the money involved in the financial transactions was the proceeds of illegal drug trafficking, and that the transactions were designed, at least in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds, and to avoid a reporting requirement under federal law (that is, the Form

8300). During the course of the conspiracy, **MOHAMMADI** participated in transactions in the Southern District of Texas involving at least \$177,345.00 of United States currency (USC) that represented proceeds of the distribution of controlled substances, a specified unlawful activity, in violation of Title 21, United States Code, Section 841(a)(1).

On March 21, 2012, a courier delivered \$299,244 in USC to a Confidential Source (CS) in Laredo, Texas. The CS contacted **MOHAMMADI** and was instructed by **MOHAMMADI** to go by MAV Trading. On March 22, 2012, the CS delivered \$10,000.00 in USC to **MOHAMMADI** at his perfume store, MAV Trading, located in Laredo, Texas, on behalf of one of **MOHAMMADI**'s Mexican-based perfume customers.

On April 20, 2012, the CS received \$50,000.00 in USC from another courier in Laredo, Texas. Co-conspirator Francisco Lopez Huesca (Huesca) instructed the CS to deliver the money to three businesses in Laredo, Texas. On April 23, 2012, Huesca instructed the CS to deliver \$10,000.00 in USC to MAV Trading. On that same date, the CS delivered the \$10,000.00 USC to **MOHAMMADI** at his business.

On May 8, 2012, Co-conspirator Carlos Velasquez delivered \$20,000.00 in USC to the CS. Huesca then telephoned the CS and provided instructions to the CS regarding the disposition of the \$20,000.0 in USC. **MOHAMMADI** then contacted the CS via telephone and instructed to the CS to delivery \$12,000.00 to MAV Trading. On May 9, 2012, the CS delivered \$12,000.00 in USC to **MOHAMMADI** at Mav Trading. **MOHAMMADI** later filed a Form 8300 where he falsely indicated that the \$12,000,00 in USC were received from J.L.V., a customer of **MOHAMMADI**.

Between October 12, 2012 and October 31, 2012, \$73,595.00 was structured into an undercover (UC) account. On November 1, 2012, Co-conspirator Beatriz Salcedo Carreon

(Salcedo) directed the CS to deliver \$30,031 in USC to several businesses in Laredo, Texas. As directed, on November 1, 2012, the CS delivered \$5,000.00 in USC to **MOHAMMADI** at MAV Trading.

On November 21, 2012, at the direction of Salcedo, UC agents picked up \$150,000.00 in bulk drug proceeds in New York, New York. The UC agents were then directed to deliver the USC to the CS in Laredo, Texas. On November 27, 2012, Salcedo instructed the CS to deliver \$50,000.00 in USC to **MOHAMMADI** for the account of M.L.S.H. The CS delivered the \$50,000.00 in USC in a plastic bag to **MOHAMMADI** at MAV Trading. During the delivery, the CS recorded a conversation with **MOHAMMADI** where **MOHAMMADI** discussed the filing of false Form 8300s, the structuring of money into his bank accounts, and money laundering techniques and fees that the CS should use with the organization.

Surveillance then followed **MOHAMMADI** to his residence and observed **MOHAMMADI** carry the bag into the residence. Later, **MOHAMMADI** filed a Form 8300 he falsely claimed that he had received \$20,000.00 in USC from M.L.S.H. On November 29, 2012, an employee of MAV Trading deposited \$20,000.00 in USC in the MAV Trading account at Compass Bank. Compass Bank also filed a Currency Transaction Report (CTR) documenting that cash deposit.

Between November 28, 2012 and November 29, 2012, \$26,960.00 in USC was deposited into the UC account at the direction of Salcedo. Salcedo then instructed the CS to contact Mexican clients to see who need USC for the perfume stores. M.L.S.H. accepted \$12,285.00 and directed the CS to deliver the USC to MAV Trading for her account. On November 30, 2012, the CS delivered \$12,285.00 to **MOHAMMADI** at MAV Trading. Later, **MOHAMMADI** filed a Form 8300 where he falsely indicated that the USC had been received from M.L.S.H.

On June 7, 2013, at the direction of Co-conspirator Mauricio Anzures Zarate, UC Agents picked up \$70,000.00 in bulk drug proceeds in Houston, Texas. The USC was deposited into the UC account. On June 10, 2013, at the direction of Huesca, the CS delivered \$5,000.00 in USC to **MOHAMMADI** at the St. Patrick's Church parking lot in Laredo, Texas. During the delivery, **MOHAMMADI** to the CS that the money **MOHAMMADI** was receiving was not "clean money" and acknowledged it was all drug money. **MOHAMMADI** admitted to the CS that **MOHAMMADI** was laundering money for people in Mexico.

Defendant, **MOHSEN MOHAMMADI-MOHAMMADI**, hereby confesses and judicially admits that on **beginning o or about October 2011 and continuing at least to on or about October 2013**, he knowingly conspired to launder monetary instruments, in violation of Title 18, United States Code, Sections 1956(h).

x




MOHSEN MOHAMMADI-MOHAMMADI
Defendant

APPROVED:

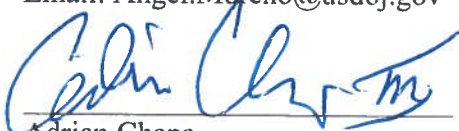
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